

REMARKS

As a preliminary matter, the Examiner stated in the Official Action dated March 24, 2003, Paper No. 6, ¶1, that the Information Disclosure Statement (IDS) filed July 14, 2000, does not comply with 37 C.F.R. §1.98 (a) (2) because the Abstract portions of Japanese Patent Document Nos. 9062514 and No. 3077142 do not contain concise explanations of relevance. The English language abstracts provided in the IDS of July 14, 2000 for Japanese Patent Document Nos. 9062514 and 3077142 satisfy the rule and Applicants request consideration of those patent documents in the form submitted on the basis of the English language abstracts.

Claims 1, 4-7, 10-13, 15-17 and 19 stand rejected under 35 U.S.C. § 102(a) on the basis of Aho et al., Compilers: Principles, Techniques, and Tools ("Aho"). Applicants traverse these rejections for at least the reasons given in Applicants' Amendment A, because the storing of records does not anticipate the storing of rules, and for the following additional reasons.

The Examiner maintains that Aho discloses "type checking and storing rules in a table (see pp. 343-346 [of Aho])." See Paper No. 8, ¶ 3, pp. 2-3. The Examiner states that Aho discloses "storing, in a language-specific table one or more predetermined rules which are specified for one or more programming languages"(Applicants' claim 1, step (a)) (see Paper No. 6, ¶ 5), explaining that "a symbol table is the result of language specific rules stored for later use" (see Paper No. 8, ¶ 3, p. 3). Aho discloses that "[a] symbol table is a data structure containing a record for each identifier [used in the source

program], with fields for the attributes of the identifier. The data structure allows us to find the record for each identifier quickly and to store or retrieve data from that record quickly.” (See Aho, p. 11.) Assuming, arguendo, that the Examiner is correct in arguing that a symbol table is the result of language-specific rules stored for later use, a point Applicants do not concede, the storing of records for each identifier used in a source program as a result of language-specific rules is not the same as “the step[] of: (a) storing, in a language-specific rule table, one or more pre-determined rules which are specified for one or more programming languages ... wherein in said step (a), said one or more predetermined rules are stored in said language-specific-rule table as one or more language-specific-information analyzing functions,” as recited in Applicants’ claim 1. To summarize this argument, the storing of records does not anticipate the storing of rules.

Moreover, Aho does not disclose rules on which analyzing a program code is based. The Examiner states that “Aho disclosed several rules of analyzing code (page 6, paragraph 4 with bulleted items).” (See Paper No. 8, ¶3, p. 2). Assuming that the Examiner refers to the numbered rules beginning with “1. Any identifier is an expression” at the citation to Aho, the rules disclosed by Aho are rules for defining expressions, and more generally, rules for expressing the hierarchical structure of a program, not, as claimed by applicants in claim 1, rules on which analyzing a program code is based. See Aho, p. 11.

Aho discloses hierarchical or syntax analysis, but that analysis “involves grouping the tokens of the source program into grammatical phrases that are used by the

compiler to synthesize output.” See Aho, p. 11. As Applicants state in their specification at p. 13, line 14 – p. 14, l. 25, such syntax analysis of source code occurs before the recited analyzing step (b) of claim 1. For this reason, syntax analysis cannot anticipate the claimed analyzing step.

The Examiner also states that Aho discloses “determining values” as claimed by Applicants by disclosing “type checking.” See Paper No. 6, ¶ 5, p. 4. Aho discloses that “[a] type checker verifies that the type of a construct matches that expected by its context. For example, the built-in arithmetic operator mod in Pascal requires integers operand, so a type checker must verify that the operands of mod have type integer.” See Aho, pp. 343-44. Verifying that the type of a construct matches that expected by its context, as disclosed by Aho, is not the same as “determining values of or relationships between variables included in said program code, based on at least one of said one or more language-specific information analyzing functions read out in said step (d), and producing said analysis result which includes the determined values of or relationship between the variables,” as recited in claim 1.

The Examiner states that Aho discloses “reading out” as claimed by Applicants by disclosing a “lookup” operation. See Paper No. 6, ¶ 5, p. 3; Paper No. 8, ¶ 3, p. 3. Aho discloses at p. 478, ¶ 3, “[o]peration lookup(id.name) checks if there is an entry for this occurrence of the name [which stands for a pointer to its symbol-table entry] in the symbol table.” Thus, Aho’s lookup operation looks up a symbol, not a rule. Applicants distinguished symbols from rules in the discussion above.

Applicants respectfully submit that features recited in Applicants' independent claim 1 are absent in Aho for at least the reasons discussed above, and that features now recited in Applicants' independent claims 7, 13, 17 and 19 are absent in Aho for at least the reasons discussed above with respect to independent claim 1. For at least these reasons, Applicants respectfully submit that independent claims 1, 7, 13, 17 and 19 and all dependent claims are allowable over the references of record, including Aho, and respectfully request reconsideration and withdrawal of the rejections of claims 1, 4-7, 10-13, 15-17 and 19.

For the foregoing reasons, applicants believe that this case is in condition for allowance, which is respectfully requested. The examiner should call applicants' attorney if an interview would expedite prosecution.

Respectfully submitted,

GREER, BURNS & CRAIN, LTD.

By



Patrick G. Burns

Registration No. 29,367

December 24, 2003
300 S. Wacker Drive - Suite 2500
Chicago, Illinois 60606-6501
Telephone: (312) 360-0080
Facsimile: (312) 360-9315
Customer No. 24978

K:\0328\64472\Amendment B.doc